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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

UNITED STATES OF AMERICA

3:20-mj-00153

v.

JACOB MICHAEL GAINES,

**GOVERNMENT’S MOTION TO SEAL
UNREDACTED CRIMINAL
COMPLAINT AND AFFIDAVIT**

Defendant.

The United States of America, through Billy J. Williams, United States Attorney for the District of Oregon, and through Assistant United States Attorney Christopher Cardani, hereby requests that the Complaint and Affidavit herein, Docket Number 1, be sealed.

The Complaint and Affidavit contain the victim’s personal identifying information. The Government will publicly file a redacted Complaint and Affidavit without this information.

To prevent the public disclosure of the victim's information, the government respectfully requests an order to seal Docket Number 1.

Dated: July 14, 2020.

Respectfully submitted,

BILLY J. WILLIAMS
United States Attorney

/s/Christopher Cardani
CHRISTOPHER CARDANI
Assistant United States Attorney